

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

MASSACHUSETTS MUTUAL LIFE
INSURANCE COMPANY,

Plaintiff,

v.

No. 11-cv-30285-MAP-RBC

MERRILL LYNCH, PIERCE, FENNER &
SMITH, INC.; DEUTSCHE BANK
SECURITIES INC.; GOLDMAN, SACHS &
CO., INC.; J.P. MORGAN SECURITIES LLC;
AND RBS SECURITIES, INC.,

Defendants.

**JOINT MOTION FOR APPROVAL OF STIPULATION AND [PROPOSED] ORDER
MODIFYING THE JUNE 27, 2012 SCHEDULING ORDER**

This matter comes before the Court by Stipulation of Plaintiff Massachusetts Mutual Life Insurance Company (“MassMutual”) and Defendants in the above-captioned action (collectively, “Defendants”) seeking an Order modifying the June 27, 2012 Scheduling Order. MassMutual and Defendants agree that additional time is required for discovery for reasons beyond the parties’ control, including complexities arising from the bankruptcy of the sponsor and depositors of the securitizations at issue, the fact that final collateral files relating to the loans in the securitizations were not produced until January 18, 2013, ongoing non-party discovery, and the fact that motions to compel remain pending, as well as to permit continued party document discovery.

IT IS HEREBY STIPULATED AND AGREED by and between MassMutual and Defendants, through their undersigned counsel, subject to the approval of the Court, that the remaining dates in the June 27, 2012 Scheduling Order (Dkt. No. 60) will be modified as follows:

1. A joint proposal for deposition discovery will be filed by May 3, 2013.
2. Document discovery will be substantially completed by June 28, 2013.
3. Non-expert depositions will be completed by December 27, 2013.
4. Plaintiff's affirmative expert reports will be due by January 31, 2014.
5. Defendants' expert reports will be due by May 16, 2014.
6. Plaintiff's rebuttal expert reports will be due by June 27, 2014.
7. Expert discovery will be completed and all discovery will close by August 29, 2014.
8. Motions for summary judgment will be filed by October 24, 2014 and opposed by November 21, 2014. Reply briefs, if necessary, may be filed by December 19, 2014.

IT IS SO ORDERED.

Dated: _____, 2013

Michael A. Ponsor
United States District Judge

Dated: January 31, 2013

Respectfully Submitted,

MASSACHUSETTS MUTUAL LIFE INSURANCE
COMPANY

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CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this 31th day of January, 2013.

/s/ Edward J. McDonough Jr.

Edward J. McDonough Jr., Esq.